

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

ALAN GOLDMAN,

Plaintiff

v.

MCCONNELL VALDES, LLC;
ANTONIO A. ARIAS-LARCADA, his wife
MRS. ARIAS, and the Conjugal Partnership
composed by them;
JOSE IRIZARRY-CASTRO;
JOHN DOE; MARY DOE
UNKNOWN INSURANCE COMPANY;

Defendants

CIVIL NO.: 24cv01136(SCC)

**MOTION REQUESTING COURT ORDER ADMONISHING PLAINTIFF TO
COMPLY WITH LOCAL RULE 7(C)**

TO THE HONORABLE COURT:

NOW APPEAR co-defendants Antonio Arias Larcada, his wife Maria Beale, and the Conjugal Partnership constituted between them, and McConnell Valdés, LLC., through their undersigned counsel, and very respectfully state and pray as follows:

1. Yesterday, March 27, 2025, the plaintiff filed two motions entitled “Response to Defendants’ Opposition to Plaintiff’s Motion for (sic) Change Venue” (Dkt. No. 112) and “Response to Defendants’ Opposition to Plaintiff’s Motion for Leave to file Verified Third Amended Complaint” (Dkt. No. 114). Both of these motions are ostensibly Replies to the appearing defendants’ Memorandum in Opposition to the Plaintiff’s “Motion to Change Venue” (Dkt.

No. 108) and Memorandum in Opposition to Plaintiff's "Motion for Leave to File Verified Third Amended Complaint" (Dkt. No. 111), respectively.

2. This Court's Local Rule 7(c) provides that "[w]ith prior leave of court and within seven days of the service of any objection to a motion, the moving party may file a reply, which shall not exceed ten (10) pages in length, and which shall be strictly confined to responding to new matters raised in the objection or opposing memorandum."
3. Plaintiff's latest "Responses" at Dkt. Nos. 112 and 114 were filed without leave of Court and Dkt. No. 114 was filed more than seven (7) days after the defendants' Memorandum in Opposition to which it is meant to respond. This is not the first time that Plaintiff flouts the Court's procedural rules by filing untimely and unauthorized replies. See, e.g., Dkt. Nos. 62, 65, 88.
4. The appearing defendants understand that the Plaintiff's latest "Responses" at Dkt. Nos. 112 and 114 add nothing to the discussion of the matters raised in their respective Memoranda in Opposition. Nevertheless, the Plaintiff's continued disregard for Local Rule 7(c) should not be countenanced by the Court. This rule exists for good reason and must be respected by the parties and their counsel. The Plaintiff should be admonished to abide by its directive in the future or face consequences, including sanctions.

WHEREFORE, for all of the above stated reasons, it is respectfully requested that the Honorable Court issue an Order admonishing the Plaintiff to abide by Rule 7(c) in future filings or face sanctions.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 28th day of March, 2025.

I HEREBY CERTIFY that on this 17th day of March, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all the counsel of record.

S/MANUEL SAN JUAN

MANUEL SAN JUAN

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